

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Julian Matthew Rendon

Case: 2:23-mj-30242

Assigned To : Unassigned

Case No. Assign. Date : 6/8/2023

CMP USA V. RENDON (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 6, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841 (a)(1) and (b)(1)(A)

Possession with intent to distribute a controlled substance

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: June 8, 2023

City and state: Detroit, MI



Complainant's signature

Danzell Tolbert Special Agent, DEA

Printed name and title



Judge's signature

Hon. Anthony P. Patti, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Danzell Tolbert, Special Agent with the Drug Enforcement Administration (“DEA”), being first duly sworn, on oath, hereby depose and state as follows:

Introduction and Agent Background

1. I make this affidavit in support of a criminal complaint charging Julian Matthew RENDON with the possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).
2. I am employed as a Special Agent (“SA”) with the DEA assigned to the Detroit Field Division, Flint Resident Office, which is located in Genesee County, Eastern District of Michigan and have served in this capacity since June of 2019. I have received specialized training on the subject of drug trafficking and money laundering from the DEA.
3. Prior to my tenure with the DEA, I was employed as a trooper with the Michigan State Police for approximately four and a half years. In addition to my training with the DEA, I graduated from the Michigan State Police Academy in Lansing, Michigan. I am presently involved in overt and covert drug-related investigations. Many of those investigations have resulted in the seizure of methamphetamine, heroin, and/or fentanyl. As part of these investigations, I have

conducted or participated in physical and electronic surveillance, the execution of search warrants, debriefing of informants, questioning of witnesses, hand-to-hand purchases of narcotics, and reviewed recorded conversations related to illegal narcotics. I am working in conjunction with other federal, state, and local police agencies investigating illegal trafficking of controlled substances and the collection and trafficking of related drug proceeds throughout the United States of America and abroad. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(c), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for federal criminal offenses and make requests for warrants.

3. I make this affidavit from personal knowledge based on the following: my participation in this investigation, including conducting interviews, observing interviews by other law enforcement officers, communications with others who have personal knowledge of the events and circumstances described herein, and information gathered through my training and experience. The information outlined below is for the limited purpose of obtaining a criminal complaint and an arrest warrant. I have not set forth every fact I have learned in this investigation.

Probable Cause

4. On June 6, 2023, at approximately 10:53 pm, DEA Group Supervisor (GS) Jonathan Ress and other investigators followed a Honda Accord bearing California

license plate: 9FSH407 (the “Accord”), as it traveled eastbound on Warren Avenue from Schaefer Road as it left a Mobile gas station. To maintain pace with the Accord, GS Ress traveled approximately 45 miles per hour in a posted 35 mile per hour zone. At approximately 11:01 p.m., while in a fully marked patrol car, Michigan State Police Troopers Joshua Olszewski, Cody Longuski, Michael LaForge, and Rene Mejia activated their overhead lights and attempted a traffic stop of the Accord near the intersection of Warren Avenue and 32nd Street in the City of Detroit, within the Eastern District of Michigan, for a speeding violation. Despite the troopers’ patrol car’s lights being activated, the Accord drove around the patrol car, disregarded a red traffic light, and traveled at a high rate of speed eastbound on Warren Avenue, committing additional traffic infractions. These violations were captured on dashcam with the exception of the initial speeding violation.

5. Troopers LaForge, Longuski, and Mejia activated the patrol car siren in pursuit of the Accord further signaling it to stop, but it failed to do so and continued traveling at a high rate of speed while disregarding several traffic signals. The Accord continued to drive recklessly, traveling at speeds in excess of 100 miles per hour until trooper LaForge used the Precision Immobilization Technique to immobilize the vehicle near the intersection of Grand River Avenue and Times Square. Troopers approached the driver of the Accord, who was later

identified as Julian Matthew RENDON, and detained him. After RENDON was detained, Trooper Olszewski utilized his canine, trained to detect the odor of illegal controlled substances, which include the detection of methamphetamine. Trooper Olszewski's canine conducted a free air sniff of the Accord and it alerted for the presence of illegal controlled substances. During a search underneath the rear seat of the Accord, trooper Olszewski and DEA Task Force Officer James Drinkard located the following:

- (10) vacuum-sealed plastic baggies containing a white crystal-like substance weighing approximately 4.74 kilograms. Please see the image below.



- On June 8, 2023, SA Brandon Follrod, with the DEA, conducted a field test of the white crystal-like substance, and it indicated positive for the presence of methamphetamine.

6. Based on my training and experience, the white crystal-like substance contained within each of the packages appears consistent with how crystal methamphetamine looks.

7. SA Follrod and I interviewed RENDON at the Garden City Police Department. Before questioning him, I advised him of his *Miranda* rights and RENDON said he understood. During the interview, RENDON stated that he lived in California and traveled to Michigan via United Airlines on June 6, 2023. Rendon said that once he arrived in Michigan, he attempted to find an available hotel room but was unsuccessful. RENDON then invoked his *Sixth Amendment* right to counsel. At that point, Agents stopped their questioning.

7. On June 7, 2023, I queried RENDON's criminal history through a law enforcement database and learned that he does not have a criminal history.

8. Based on my training and experience, more than 500 grams of methamphetamine is inconsistent with personal use, and alone shows an intent to distribute. Furthermore, based on my training and experience, the

methamphetamine was packaged in such a way that is often done when distributing pound quantities at a time.

Conclusion

9. Based on the foregoing information, Affiant believes probable cause exists for a criminal complaint for JULIAN RENDON for possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

I declare under the penalty of perjury that the above facts and circumstances are true and correct to the best of my knowledge and belief.

Respectfully submitted,



Danzell Tolbert
Special Agent
Drug Enforcement
Administration

Sworn to before me and signed in my presence
And/or by reliable electronic means.



Hon. Anthony P. Patti June 8, 2023
United States Magistrate Judge